

TECHNICAL REVIEW DOCUMENT FOR RENEWAL OF OPERATING PERMIT 95OPLR064

to be issued to:

Anheuser Busch, Inc.
Larimer County
Source ID 0690060

Cathy Rhodes
November, 2003

I. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued October 1, 1999 and expires on October 1, 2004. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted October 1, 2003. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

II. Source Description

This facility produces beer. Brewery wastewater is piped to Nutriturf, Inc., a subsidiary of Anheuser-Busch, for land application in Weld County. The Nutri-turf facility and the Brewery are considered to be a single source for Prevention of Significant Deterioration requirement purposes. The landfarm is permitted under Operating Permit 98OPWE204.

This facility is located in Fort Collins, Larimer County, Colorado. The area is classified as an attainment/maintenance area for carbon monoxide (CO). Wyoming is an affected state within 50 miles of the facility. There are two Federal Class I areas within 100 kilometers of the facility: Rocky Mountain National Park and Rawah National Wilderness Area.

Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential (TPY)</u>	<u>Actual (TPY)</u>
Particulate Matter (PM)	193	8
PM ₁₀	193	8
Nitrogen Oxides (NO _x)	544	73
Sulfur Dioxide (SO ₂)	1410	<1
Volatile Organic Compounds (VOC)	215	66
Carbon Monoxide (CO)	100	18

Potential emissions are based on permitted levels. Actual emissions are based on the most recent AIRS data.

Potential landfarm VOC emissions (mainly ethanol) are 236 tons/year, based on permitted emission limits. Actual VOC emissions from the landfarm, based on the most recent AIRS data, are 110.0 tons per year.

This source does not emit major amounts of any Hazardous Air Pollutants.

II. Discussion of Modifications Made

Source Requested Modifications

The permittee requested the following revisions to the Operating Permit in their renewal application.

Page following Cover Page

The Facility Contact Person is changed.

Section I

The description of some of the area activities is revised/clarified in the Condition 4.1 table. The permittee also requested revisions to the footnotes.

Section II

New Condition 1 is added to reflect that the monitoring provisions for this permit are included in Appendix H, and the procedures for modifying the appendix. Standard Division language is used (differs from permittee's proposed language). The renewal application includes some, but not all, monitoring provisions in Appendix H, and leaves some monitoring provisions within the body of the permit. For consistency, the Division has moved all of the monitoring provisions to Appendix H.

Condition 2.1 and throughout. Revised to indicate that rolling twelve month totals will be

calculated within 30 days after the last day of each month. The permittee proposes revisions to the monitoring procedure to differentiate between grain unloading and conveying amounts.

Conditions 2.4 through 2.7 – The renewal application removes the Regulation No. 6, Part B opacity limit. Since the original permit was issued, the Division has determined that the Regulation No. 1, II.A.1 20% opacity limit cannot be streamlined out for the PSD sources, because the PSD opacity limit does not apply during malfunctions but the Regulation No. 1 limit does. The Regulation No. 6 opacity limit can remain streamlined out for the PSD sources, but not for the remaining sources. See attached Opacity Streamlining Grid.

The permittee requested that Areas 3-7 be combined into one condition. These areas are combined into new Condition 3, and subsequent permit conditions are renumbered accordingly.

Conditions 5.9 through 5.12 – For boilers B091 through B094, the Regulation No. 1 30% and the Regulation No. 6 20% opacity limits can be streamlined out because the PSD 10% limit is more stringent. The Regulation No. 1 20% opacity limit cannot be streamlined out because the 10% limits does not apply during malfunctions, and the 20% limit does.

Boiler B991 is removed from the permit. The boiler is no longer operating at this facility. The application combined separate PM, SO₂, and NO_x emission limits into one condition. The renewed permit maintains separate permit conditions for each separate limit, for inspection and enforcement purposes.

Procedures for estimating annual emissions for APEN and fee purposes are added.

Condition 5.1 – The application requests that instead of performing a fuel oil burning PM test within the first year of each permit renewal, that a test be performed within five years of each test. The current language was negotiated with Anheuser Busch in order to ensure that sequential tests do not occur too close together. Therefore, the current operating permit language is not revised as requested.

Condition 5.4 is revised by the Division to separate the annual and hourly emissions limits into separate permit conditions, for inspection and enforcement purposes, and to make the format consistent with other pollutant emission limit conditions.

Condition 5.8 – The Division has removed the requirement for a separate statement regarding natural gas use with the annual compliance report.

Condition 5.9 – The renewal application revises the opacity monitoring for fuel oil use other than for test fires to require semi-annual instead of quarterly. The Division has determined that, for extended use of fuel oil, quarterly readings meet the periodic monitoring requirements, therefore the requested revision is not made. The permittee requested that footnotes at the bottom of the summary tables indicate the applicable requirement for each condition. The Division has instead included the citation for each

applicable requirement in each permit condition, consistent with the Division's policy for drafting operating permits, and in accordance with the Part 70 operating permit rules. As requested, the sources for emission factors are included as footnotes to the tables.

Condition 12 – The condition is revised to include a list of the emission limits for which this reporting requirement applies. Since BACT for the majority of VOC emission sources at this facility has been determined to be "Efficient Process Operation," the emission limits for such sources are not subject to this reporting requirement.

Condition 13.2 is deleted. Appendices B and C reports include certification for insignificant activities, and a separate statement is not necessary.

Condition 15.2 – The application deleted this condition from the permit. This condition is still an applicable requirement. Construction of new sources must commence within 18 months of permit issuance or the date stated in the PSD application, or the permit to construct those new sources expires. In addition, if construction does not commence within 18 months of the stated dates, the BACT analysis must be updated.

The permittee requested the addition of a condition which would state that certification documents as referred to in Section IV, Condition 2.a of the permit would only include certain documents. This provision is not included in the renewed permit because some of the listed documents are not certified by the responsible official, and the Division has the authority to request certification of documents that are not listed.

The permittee requested that language be added to the permit to indicate that "false positive" excess emission CEMs readings shall not be reported. The Division believes an excess emission report should be filed anytime there is a reading of excess emissions, regardless of the reason. This allows the Division to identify recurring CEMs problems. The requested language is not included in the renewed permit.

Section III

The streamlined requirements are corrected to indicate that the Regulation No. 1 20% opacity limit cannot be streamlined out for the PSD grain handling sources and for the B091 through B094 boilers.

Appendices

Appendices B and C are revised to reflect the revisions made to the Section I, Condition 4.1 table.

The permittee requested the addition of Appendix H, which contains the monitoring provisions. Monitoring provisions are revised as indicated for each condition under Section II, above. The application does not include a supplemental table, as indicated in the proposed Appendix H language. In addition, the Division approves the use of a spreadsheet for tabulating records and calculating emissions, however, raw data used to input information to the spreadsheet must be maintained for Division inspection upon request.

Other Modifications

In addition to the changes requested by the permittee, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Anheuser Busch, Inc. Operating Permit:

Section I

Condition 2 is revised to reflect current Division language.

Section II

Condition 2.2 is removed. The compliance reports in Appendices B and C require certification that insignificant activities meet all applicable requirements. A separate statement is not necessary.

Condition 5.7 is revised to reflect current Division policy regarding the use of ASTM test methods or equivalent.

Condition 9 – The EPA has published revisions to the NSPS Subpart Kb, to no longer require exempt tanks to maintain records of tank capacity, etc. Subpart Kb requirements are therefore removed from the permit.

Section III

The title of Condition 1 and the regulatory cite are revised.

The Justification for Area 9 boilers is revised in accordance with EPA comments for other operating permits.

Section IV – General Conditions

Revised to include the latest version of the general conditions, which reflect modifications to the Regulation No. 3 numbering system.

Appendix G – Required Reports

The Due Date for Semi-annual and annual compliance reports is revised to indicate that the reports must be received in the Division's office by the close of business on the due date, in accordance with the Note on the page following the cover page of the permit.

Compliance Assurance Monitoring (CAM)

Emission points that use a control device to achieve compliance with an emission limitation or standard and have precontrolled emissions that exceed or are equivalent to the major source threshold are subject to the CAM provisions at time of permit renewal. The CAM rule defines "Control device" as "equipment, other than inherent process equipment, that is used to destroy or remove air pollutants prior to discharge to the atmosphere." "Inherent process equipment" means "equipment that is necessary for the proper safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment." The preamble to the final CAM rule lists three criteria to be used to distinguish inherent process equipment from control devices:

- (1) Is the primary purpose of the equipment from control devices?
- (2) Where the equipment is recovering product, how do the costs savings from the product recovery compare to the cost of the equipment?
- (3) Would the equipment be installed if no air quality regulations are in place?

The Area 2 Grain Handling operations at this facility are equipped with baghouses. The grain handling operations are subject to annual and grain loading PM emission limits. The grain loading limit is 0.020 gr/dscf. The Division has determined that, using the three criteria listed in the preamble, the baghouses are inherent to the process. The primary purpose of the baghouses is to recover product, not to control air pollution, and would be installed if no air quality regulations were in place. The baghouses also meet the definition of "inherent process equipment" because the baghouses do not need to be operated at a higher efficiency form normal operations in order to comply with the emission limits. Stack test information for a representative baghouse in Area 2 (P021) indicates emissions were a factor of 5 times lower than the grain loading standard during the test. Information regarding baghouse throughput for the Area 2 operations indicates P021 represents a worst case scenario for short term emissions. The Division believes it is therefore reasonable to determine that all of the Area 2 baghouses do not need to be operated at a higher efficiency, and all of them therefore are "inherent process equipment."